

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

5 September 2007

The Honourable Charles Strahl
Minister of Indian and Northern Affairs
House of Commons
Ottawa ON K1A 0A6

By Fax: (613) 944-9376

**Re: Recommendation by Mackenzie Valley Environmental Impact Review Board
on Land Use Application by Ur-Energy Inc.**

Dear Minister Strahl:

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) has reviewed the recommendation made by the Mackenzie Valley Environmental Impact Review Board (MVEIRB) to reject Ur-Energy's proposed project. The BQCMB supports this recommendation and MVEIRB's suggestions made as part of this recommendation regarding land use planning, consultation with aboriginal users of the area, and regional assessment of cumulative effects of mineral exploration on barren ground caribou. The BQCMB believes that the recommendation and suggestions are consistent with the information provided to the MVEIRB throughout the environmental assessment of this proposed project.

The Role of the BQCMB in Caribou Management and Environmental Assessment

The BQCMB is a co-management board established in 1982 to co-ordinate the management of the Beverly and Qamanirjuaq caribou herds. The Board's mission is to ensure the long-term conservation of the Beverly and Qamanirjuaq caribou herds for Aboriginal communities who wish to maintain a lifestyle that includes the use of caribou, as well as for all Canadians and people of other nations. The mandate of the BQCMB, provided by the multi-jurisdictional *Beverly and Qamanirjuaq Barren Ground Caribou Management Agreement (2002)*, is to advise governments and caribou range communities on ways to protect the Beverly and Qamanirjuaq caribou herds and their ranges.

The BQCMB is not against mining. Board members recognize that people living on caribou ranges need jobs through economic development. However, they also know that people from communities across the caribou ranges do not want jobs that harm the caribou herds. The BQCMB believes that communities, governments, regulatory boards, industry and non-government organizations should work together to protect the caribou herds and their ranges. Several years ago, the Board produced a paper outlining action that is needed to protect the caribou herds, including: establishing protected areas, improving existing conservation tools, conducting cumulative effects assessment, collecting information about the caribou herds and their important habitats, and regional land use planning.

The BQCMB participated in the environmental assessment of Ur-Energy's proposed project and made many submissions to the MVEIRB outlining our concerns about the potential impacts of this proposed project and the cumulative effects of mineral development on barren-ground

Secretariat Address: P.O. Box 629 Stonewall MB R0C 2Z0
Tel: (204) 467-2438 e-mail: rossthompson@mts.net
website: www.arctic-caribou.com

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caribou and the people that depend on caribou. This included a presentation to the public hearing about caribou-related issues for which we provided extensive background.

The Role of Caribou in the Culture of Northern Aboriginal Peoples

The MVEIRB based their recommendation to reject Ur-Energy's proposed project on their conclusion that "the impacts of the proposed development in combination with the combined impacts of all other past, present and reasonably foreseeable human activities in the area are likely to have a significant adverse cultural impact on the aboriginal people who value the area." Letters to the previous Minister of INAC in response to their recommendation indicate that some parties do not understand the key role that barren-ground caribou play in the culture and traditional lifestyles of northern aboriginal peoples including the Akaitcho people.

The strong link between barren-ground caribou and the culture of aboriginal peoples in communities in the NWT and northern Saskatchewan was clearly stated by many speakers from these communities at the Ur-Energy hearing. In the BQCMB's presentation to the hearing, we made the case that the impacts of the proposed development and the cumulative impacts of all other human activities on the Beverly and Ahik caribou ranges may have significant adverse effects on these barren-ground caribou herds. We also explained that these adverse effects on caribou would likely result in significant adverse effects on the aboriginal people who rely on these caribou herds. This would form a key element of the "cultural impacts" anticipated by MVEIRB.

BQCMB Recommendations to MVEIRB

To facilitate your briefing on this file, we have attached the recommendations we made to the MVEIRB on this project and provide a summary below.

- 1) **Recommendations from the BQCMB** – These recommendations were made by the BQCMB on 16 January 2007 to the MVEIRB as part of the Powerpoint presentation provided to the hearing.

The BQCMB recommended that a precautionary approach should be applied to permitting development across the Beverly and Ahik caribou ranges because of the uncertainty that exists both about the caribou herds and the cumulative effects of development on caribou. Recommendations called for research on Beverly and Ahik caribou, cumulative effects impact analysis for proposed developments across the ranges of Beverly and Ahik caribou, regional land use planning that incorporates the value of caribou and caribou habitat, and a range-wide system of conservation planning to safeguard the caribou herds over the long-term.

- 2) **Joint recommendations from the BQCMB and the Government of the Northwest Territories (GNWT) Department of Environment and Natural Resources (ENR)** – These are the final recommendations made after the hearing, which incorporated and addressed changes to Ur-Energy's proposed activities and their scheduling as presented at the hearing and discussed during question periods. These recommendations were provided to the MVEIRB in a letter from the BQCMB on 12 February 2007.

Secretariat Address: P.O. Box 629 Stonewall MB R0C 2Z0
Tel: (204) 467-2438 e-mail: rossthompson@mts.net
website: www.arctic-caribou.com

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In our joint presentation with the GNWT-ENR, we outlined caribou-related issues that needed to be addressed, including shortcomings of the land use application with respect to caribou and cumulative effects. The first joint BQCMB/GNWT recommendation was that "MVEIRB should not accept the statement from Ur-Energy that the residual impacts to caribou will be 'minor', or that cumulative impacts will have a 'negligible environmental consequence'. This recommendation was provided because no evidence was supplied by Ur-Energy to support the assumptions upon which their conclusions concerning impact significance are based, and the screening report was not adequate to support the conclusions made about potential impacts to caribou, cumulative effects, or the significance of either category.

The MVEIRB recommendation concerning the application by Ur-Energy indicates to the BQCMB that the MVEIRB seriously considered the input they received throughout the assessment process and developed reasoned conclusions based on this input. Their conclusions and recommendations were developed in agreement with the Review Board's mandate to ensure that "the impact on the environment of proposed developments receives careful consideration" and "the concerns of aboriginal people and the general public are taken into account".

The BQCMB urges the Minister to place at the recommendation of the MVEIRB and implement their suggestions regarding land use planning, consultation with aboriginal users of the area, and regional assessment of cumulative effects of mineral exploration on barren-ground caribou. This is clearly the decision required to protect barren-ground caribou, the well-being of aboriginal peoples who depend on caribou and value the upper Thelon watershed, and the interests of all Canadians.

Sincerely,


 Jerome Denechez
 BQCMB Chairperson

Attachment

cc. Ms. Gabrielle Mackenzie Scott, Chair, MVEIRB
 Chief Adeline Jonasson, Lutsel K'e
 Honourable Joseph Handley, Premier, Government of the NWT
 Honourable Michael McLeod, Minister of NWT Environment and Natural Resources
 Honourable Brendan Bell, Minister of NWT Industry, Tourism and Investment

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